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February 25, 2021

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 3/1/2021

Re: *United States v. Moises Lluberes*, 20-cr-493 (VSB)

Dear Judge Broderick:

We represent Defendant Moises Lluberes in the above-captioned case. We write to respectfully request an enlargement of time until March 5, 2021 to reply to the government's opposition to Mr. Lluberes' bail motion (ECF Doc. 43), and to oppose the government's newly filed application for a protective order, seeking post-indictment restraint of the funds requested by Mr. Lluberes to be released for use as payment of legal fees. (ECF Doc. 44 and sealed filing.)¹ Because the defendant's bail motion and the government's application to restrain the same funds implicated by the bail motion are inextricably intertwined, (*see* Gov. Opp. ECF Doc. 44 at 6-7), we seek to consolidate the briefing of these motions for the Court to consider collectively.

The additional factual and legal issues raised in the government's bail opposition and proposal for post-indictment restraints require us to present new arguments and a factual response, necessitating this enlargement request.

¹ The government indicated to defense counsel its intent to file under seal an application, declaration in support, and proposed protective order seeking post-indictment restraint of certain funds owned by Mr. Lluberes. As of this date, there is no indication on the ECF docket of these sealed documents, or application seeking leave to file them. We are, however, preparing an opposition to this proposed filing because the government has served them on the defendant and indicated it has sought to file the documents with the Court.

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We have conferred with counsel for the government who do not object to the proposed enlarged briefing schedule.

Respectfully Submitted,

MEISTER SEELIG & FEIN LLP

/s/ IH

Henry E. Mazurek

Ilana Haramati

Counsel for Defendant Moises Lluberes

cc: Counsel of Record (*via ECF*)